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**FILED**  
Clerk  
District Court

**JAN 18 2006**

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

**DAVID J. LUJAN, ESQ.**  
**IGNACIO C. AGUIGUI, ESQ.**  
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*Attorneys for Defendant World Corporation*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

YU SUK CHUNG,

Plaintiff,

vs.

WORLD CORPORATION,

Defendant.

CIVIL CASE NO. 04-00001

**DECLARATION OF IGNACIO C. AGUIGUI  
IN SUPPORT OF NOTICE OF  
WITHDRAWAL AND EMERGENCY  
MOTION FOR AN ORDER DISCHARGING  
COUNSEL AND STAYING PROCEEDINGS**

I, Ignacio C. Aguigui, declare as follows:

1. I am admitted to this case *pro hac vice*. David J. Lujan and I are partners in the Guam law firm of Lujan Aguigui & Perez LLP, and are co-counsel of record for World Corporation in this case. Our agreement to represent World Corporation ended in early December 2005, upon return of the verdict in this case, and since then, despite continued


1 discussions and negotiations with World, no further agreements have been reached between us  
2 and World to govern our continued representation of World in this matter.

3 2. We are unable to continue our representation of World in this matter in the  
4 absence of an engagement agreement to govern such representation. Accordingly, we ask the  
5 Court to discharge us as counsel of record for World Corporation in this case as soon as possible.

6 3. I submitted the Notice of Withdrawal and Emergency Motion for an Order  
7 Discharging Counsel and Staying Proceedings, filed on January 17, 2006, seeking the withdrawal  
8 and discharge of myself, Matthew Gregory, and David Lujan from the representation of World  
9 Corporation in this matter. The filing was submitted to the Court with the knowledge,  
10 concurrence, and consent of Messrs. Lujan and Gregory. We advised World Corporation of our  
11 intent to file the motion, and World Corporation has not objected. World Corporation has asked  
12 us to request that the Court grant a stay of further proceedings and deadlines, in order to secure  
13 new counsel and to allow new counsel to prepare themselves for representation of World in the  
14 proceedings.

15 I declare under penalty of perjury under the laws of the United States of America that the  
16 foregoing is true and correct to the best of my knowledge and belief.

17 Executed this 18<sup>th</sup> day of January 2006 in Saipan, CNMI.

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20 **IGNACIO C. AGUIGUI**  
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